

1 Keith J. Tierney  
10580 N. McCarran Blvd Bldg 115-403  
2 Reno, NV 89503  
3 Telephone (775) 622-3850  
kjtrustee@charter.net  
4 Trustee in Bankruptcy

5 UNITED STATES BANKRUPTCY COURT

6 DISTRICT OF NEVADA

7 IN RE:

CHAPTER 7  
CASE NO: 09-52177

9 **WES CONSTRUCTION COMPANY, INC.**

EX PARTE MOTION TO 1)EMPLOY  
STEVE BENNYHOFF, CPA AND 2)  
PAY FEES

10 Debtor(s).

11 \_\_\_\_\_ / No Hearing Required

12 Comes now Keith J. Tierney, Trustee, and files his Motion to 1)EMPLOY STEVE  
13 BENNYHOFF, CPA AND 2) PAY FEES.

14 1. The Bankruptcy Trustee is concerned with maintaining current financial records of the  
15 Debtor and the preparation of w-2 and 1099 tax documents and other accounting records for the  
16 Bankruptcy Estate and therefore requests the continuation of the employment of Steve Bennyhoff, CPA  
17 as an independent contractor.

18 2. The Trustee needs someone who is familiar with the accounting procedures for a  
19 construction company. Mr. Bennyhoff, has been maintaining the books for Wes Construction since  
20 it filed Chapter 11.

21 3. Mr. Bennyhoff, is qualified to perform the accounting services required by the Trustee.

22 4. The hourly cost for the accounting services are billed at \$80.00 per hour.

23 5. The Trustee believes that it is necessary to employ Mr. Bennyhoff, on a continuing basis  
24 until the estate is closed.

25 6. The Trustee believes that \$80.00 per hour is a reasonable amount for the work involved.

26 Wherefore, the Trustee prays for an Order approving 1) the on going Employment of Steve  
27 Bennyhoff, and 2) payment of his first invoice in the amount of One Thousand Six Hundred and forty  
28 Dollars (\$1,640) Exhibit "A".

1 Dated this 12th day of February, 2010.  
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4 /s/Keith J. Tierney  
5 Keith J. Tierney , Trustee  
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8 Approved/Disapproved  
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12 Office of the United States Trustee  
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## INVOICE

**Steve Bennyhoff  
2835 Santa Ana Drive  
Reno, NV 89502-4929**

Date	Invoice No.
1/11/2010	13

**Bill To:** WES Construction  
% Keith Tierney, Trustee  
415 Parr Circle  
Reno, NV 89512